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8 UNITED STATES DEPARTMENT OF
9 HEALTH AND HUMAN SERVICES

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 THE CENTER FOR INVESTIGATIVE) NO. 20-CV-00608-SK
14 REPORTING and AURA BOGADO,)
15 Plaintiffs,) **JOINT STATUS REPORT**
16 v.)
17 UNITED STATES DEPARTMENT OF)
18 HEALTH AND HUMAN SERVICES,)
Defendant.)

19

20 Pursuant to the stipulation of plaintiffs The Center for Investigative Reporting and Aura Bogado
21 (“Plaintiffs”) and defendant United States Department of Health and Human Services (“Defendant”),
22 ECF No. 17, the Court continued the initial case management conference (“CMC”) in this action to July
23 20, 2020 at 1:30 p.m. and required the parties to provide an interim joint status report by May 22, 2020
24 and a joint status report by July 13, 2020. ECF No. 18. The parties timely filed their joint status report,
25 ECF No. 19, and now respectfully submit this joint status report.

26 As background, at the time of the parties’ stipulation, the parties reported that they were engaged
27 in cooperative and productive communications regarding the documents sought in Plaintiffs’ five FOIA
28 requests that are the subject of this litigation, and the search for and release of responsive records. ECF
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3:20-CV-00608-SK

1 No. 17. The parties also noted that Defendant had completed searches for certain subparts of Plaintiffs'
2 requests and intended to produce responsive documents by May 22, 2020. *Id.*

3 In their interim joint status report, the parties reported that Defendant timely produced those
4 responsive documents and the parties had continued to make significant progress toward resolving the
5 remainder of Plaintiffs' requests. ECF No. 19. The parties also reported that they would provide the
6 Court with another joint status report and either request a further continuance of the CMC or, if the need
7 arose, request to appear at the CMC. *Id.* The parties respectfully submitted that this would be the most
8 efficient manner to proceed and would conserve the parties' and Court's resources. *Id.*

9 Since the date of their interim joint status report, the parties have continued to meet and confer
10 cooperatively and productively regarding the release of documents sought in Plaintiffs' FOIA requests.
11 Given that these efforts are ongoing, the parties respectfully request that the Court further continue the
12 parties' CMC from July 20, 2020 until August 24, 2020, to give the parties additional time to meet and
13 confer regarding — and Defendant additional time to conduct — the search for and release of responsive
14 records.

15 In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
16 signatories listed below concur in the filing of this document.

17
18 DATED: July 13, 2020

Respectfully submitted,
DAVID L. ANDERSON

United States Attorney
/s/ Savith Iyengar
SAVITH IYENGAR
Assistant United States Attorney

Attorneys for Federal Defendant

23
24 DATED: July 13, 2020

THE CENTER FOR INVESTIGATIVE
REPORTING

D. Victoria Baranetsky
D. VICTORIA BARANETSKY

Attorneys for Plaintiffs